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Attorneys for Defendants
AMERICAN DISCOUNT SECURITY and
DAUD WARDAK aka DAVID WARDAK

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

KEVIN WALKER,
 Plaintiff,

v.

CITY OF HAYWARD; OFFICER ART
 THOMS, OFFICER SCOTT LUNGER,
 and OFFICER ZACHARY HOYER,
 individually and in their official
 capacities; AMERICAN DISCOUNT
 SECURITY; and DAUD WARDAK aka
 DAVID WARDAK,
 Defendants.

CASE NO. C07-06205 TEH
 Assigned to Hon. Thelton E. Henderson

**INITIAL DISCLOSURES OF
 DEFENDANTS, AMERICAN
 DISCOUNT SECURITY AND
 DAUD WARDAK**

Complaint Filed : December 7, 2007
 Discovery Cut-off : None
 Motion Cut-off : None
 Trial Date : None

Defendants, AMERICAN DISCOUNT SECURITY and DAUD WARDAK
 (hereinafter "Defendants"), by their attorneys, Prindle, Decker & Amaro LLP, hereby
 submit their initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil
 Procedure.

INITIAL DISCLOSURE NO. 1:

Defendants do not presently have complete information regarding individuals
 likely to have discoverable information relevant to disputed facts alleged in the
 pleadings. Defendants are continuing their investigation to ascertain the identities of

1 individuals who may have information related to this matter and, therefore, reserve the
2 right to supplement these disclosures as additional information becomes available.

3 At this time, Defendants identify the following individuals who may have
4 knowledge of relevant facts:

- 5 1. Daud Wardak, who may be contacted through his counsel of record;
- 6 2. Sherry (last name unknown) manager of Jack-in-the Box at the time of the
7 incident.
- 8 3. Guard Bakhtawar Sing of American Discount Security c/o Prindle, Decker
9 & Amaro
- 10 4. Ajmal Boomwal of American Discount Security c/o Prindle, Decker &
11 Amaro
- 12 3. Officer Art Thoms, City of Hayward Police Department
- 13 4. Officer Scott Lunger, City of Hayward Police Department
- 14 5. Officer Zachary Hoyer, City of Hayward Police Department
- 15 6. Officer J. Snell, City of Hayward Police Department
- 16 7. Plaintiff, Kevin Walker
- 17 8. Jerry Walker, address unknown, possibly known by Plaintiff

18 **INITIAL DISCLOSURE NO. 2:**

19 Defendants are currently reviewing their files for documents they contemplate
20 using in support of their defenses to Plaintiff's Complaint or to rebut the material
21 allegations in Plaintiff's Complaint. Defendants will provide whatever information is
22 required by the rules as the facts are developed. Defendants reserve their right to
23 supplement their disclosures as provided under the Rules.

24 At this time, Defendants identify the following documents:

- 25 1. American Discount Security Incident Report
- 26 2. Any and all City of Hayward Police Reports

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INITIAL DISCLOSURE NO. 3:

Defendants seek no damages in the instant case at this time, by way of an affirmative claim.

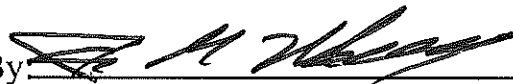
INITIAL DISCLOSURE NO. 4:

American Discount Security was covered by a policy of liability insurance at the time of the incident. Information on policy limits will be provided.

DATED: March 13, 2008

PRINDLE, DECKER & AMARO LLP

By



JAMES G. MURRAY

Attorneys for Defendants

AMERICAN DISCOUNT SECURITY and
DAUD WARDAK aka DAVID WARDAK

PROOF OF SERVICE

Kevin Walker v. City of Hayward, et al.
Case No. C07-06205 TEH

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) and am not a party to the within action; my business address is 310 Golden Shore, 4th Floor, Long Beach, California 90802.

On March 13, 2008, I caused the foregoing document to be served, described as **INITIAL DISCLOSURES OF DEFENDANTS, AMERICAN DISCOUNT SECURITY AND DAUD WARDAK** on all interested parties to this action, through the use of the website maintained by USDC for electronic service:

SEE ATTACHED SERVICE LIST



BY E-FILING: By submitting an electronic version of the document. This case has been ordered for Electronic Case Filing.



BY OVERNIGHT COURIER: I caused the above-referenced document(s) to be delivered to _____ for delivery to the above address(es).



BY FAX: I caused the above-referenced document to be transmitted via facsimile from Fax No. _____ to Fax Numbers listed on service list _____. The facsimile machine I used complies with Rule 2003(3) and no error was reported by the machine. Pursuant to Rule 2005(1), I caused the machine to print a record of the transmission, a copy of which is attached to this declaration.



BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee(s).



[State] I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



[Federal] I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on March 13, 2008, at Long Beach, California.



ALICE RUSA

Kevin Walker v. City of Hayward, et al.
Case No. C07-06205 TEH

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